

ADAM R.F. GUSTAFSON
Acting Assistant Attorney General
United States Department of Justice
Environment and Natural Resources Division

PAUL A. TURCKE (Idaho Bar No. 4759)
Trial Attorney, Natural Resources Section
1290 West Myrtle Street, Suite 500
Boise, ID 83702
(202) 532-5994
paul.turcke@usdoj.gov

Attorneys for Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

VOICE OF THE ARCTIC IÑUPIAT,

Plaintiff,

v.

Case No. 3:24-cv-00136-SLG

BUREAU OF LAND MANAGEMENT, et al.,

Defendants.

CONOCOPHILLIPS ALASKA, INC.,

Plaintiff,

v.

Case No. 3:24-cv-00142-SLG

DEPARTMENT OF THE INTERIOR, et al.,

Defendants.

NORTH SLOPE EXPLORATION, LLC, et al.,

Plaintiffs,

v.

Case No. 3:24-cv-00143-SLG

UNITED STATES DEPARTMENT OF THE INTERIOR, et al.,

Defendants.

STATE OF ALASKA,

Plaintiff,
and

ALASKA OIL AND GAS ASSOCIATION,

Intervenor-Plaintiff,
v.

BUREAU OF LAND MANAGEMENT, et al.,

Defendants.

NORTH SLOPE BOROUGH,

Plaintiff,
v.

BUREAU OF LAND MANAGEMENT, et al.,

Defendants.

Case No. 3:24-cv-00144-SLG

Case No. 3:24-cv-00145-SLG

JOINT STATUS REPORT

These cases challenge a Final Rule titled “Management and Protection of the National Petroleum Reserve in Alaska.” *See* 89 Fed. Reg. 38,712 (May 7, 2024) (the “NPR-A Rule”). While these cases were pending, Defendants issued notice of a proposed rule to rescind the NPR-A Rule. *See* 90 Fed. Reg. 23507 (June 3, 2025). Based on the unopposed joint motion by Plaintiffs, Intervenor-Plaintiff, and Defendants, further proceedings in all the cases have all been stayed, subject to submission of a joint status report within 30 days after completion of the rulemaking process or within 60 days after close of the public comment period on the proposed rule. *See* Text Order, Dkt. 44 (Case No. 3:24-cv-00136-SLG).

The 60-day public comment period ended August 4, 2025. The Department is in the process of reviewing and responding to public comments and preparing the final rule. While there are still additional steps to be completed, the Department anticipates that a final rule will be published to the Federal Register within 60 days, assuming there is no lapse in appropriations.

In light of the foregoing, Defendants, Plaintiffs, and Intervenor-Plaintiff respectfully request that the Court maintain the current stay of proceedings pending a further joint status report to be filed not later than November 21, 2025, or within 10 days of the issuance of a final rule. Counsel have conferred, and the Intervenors-Defendants in the above captioned cases take no position on this request.

Respectfully submitted,

DATED: September 30, 2025.

ADAM R.F. GUSTAFSON
Acting Assistant Attorney General
United States Department of Justice
Environment and Natural Resources Division

/s/ Paul A. Turcke
PAUL A. TURCKE
Trial Attorney, Natural Resources Section
1290 West Myrtle Street, Suite 500
Boise, ID 83702
202-532-5994 || 202-305-0275 (fax)
paul.turcke@usdoj.gov

Counsel for Defendants

Of Counsel:

JOSHUA HANSON
LINDSAY CRONIN
Office of the Solicitor
United States Department of the Interior

ASHBURN & MASON, P.C.

/s/ Matthew T. Findley (consent)

Matthew T. Findley (AK Bar No. 0504009)
1227 W. Ninth Ave., Suite 200
Anchorage, AK 99501
907-276-4331
matt@anchorlaw.com

Counsel for Plaintiff (No. 24-cv-136)

STOEL RIVES LLP

/s/ Jason T. Morgan (consent)

RYAN P. STEEN, Bar No. 0912084
ryan.steen@stoel.com
JASON T. MORGAN, Bar No. 1602010
jason.morgan@stoel.com

*Attorneys for Plaintiff ConocoPhillips
Alaska, Inc. (No. 24-cv-142)*

/s/ Malinda Morain (consent)

Theresa Sauer (admitted *pro hac vice*)
Malinda Morain (admitted *pro hac vice*)
BEATY & WOZNIAK, P.C.
1675 Broadway Street, Suite 600
Denver, CO 80202
303-407-4499
tsauer@bwenergylaw.com
mmorain@bwenergylaw.com

Attorneys for Plaintiffs (No. 24-cv-143)

STEPHEN J. COX
ATTORNEY GENERAL

Ronald W. Opsahl (Alaska Bar No. 2108081)
Ryan E. Farnsworth (Alaska Bar No. 2305047)
Department of Law
1031 W. 4th Avenue, Suite 200
Anchorage, AK 99501
907-269-5232
ron.opsahl@alaska.gov
ryan.farnsworth@alaska.gov

By: /s/ Kathleen C. Schroder (consent)
Kathleen C. Schroder (admitted *pro hac vice*)
Mark E. Champoux (admitted *pro hac vice*)
Davis Graham & Stubbs LLP
1550 Seventeenth St., Suite 500
Denver, CO 80202
303-892-9400
katie.schroder@davisgraham.com
mark.champoux@davisgraham.com

Attorneys for the State of Alaska (No. 24-cv-144)

/s/ Kevin Wynosky (consent)
PAUL D. CLEMENT (admitted *pro hac vice*)
Counsel of Record
ANDREW C. LAWRENCE (admitted *pro hac vice*)
KEVIN WYNOSKY (admitted *pro hac vice*)
CLEMENT & MURPHY, PLLC
706 Duke Street
Alexandria, VA 22314
202-742-8900
paul.clement@clementmurphy.com

Counsel for Intervenor-Plaintiff
Alaska Oil and Gas Association (No. 24-cv-144)

/s/ Tyson C. Kade (consent)
Tyson C. Kade, D.C. Bar No. 1018014
Melinda Meade Meyers
Pro Hac Vice
VAN NESS FELDMAN, LLP
2000 Pennsylvania Avenue, NW
Suite 6000
Washington, DC 20006
202-298-1800
tck@vnf.com
mmm@vnf.com

Counsel for Plaintiff North Slope Borough
(No. 24-cv-145)

CERTIFICATE OF SERVICE

I hereby certify that on September 30, 2025, a copy of the foregoing was served by electronic means on all counsel of record by the Court's CM/ECF system.

/s/ Paul A. Turcke
Paul A. Turcke